REMARKS

Claims 47-68 and 71-80 are pending in this application, with claims 47, 60, and 71 being independent claims. Claims 47-50, 52, 54, 56-60, 71-73, and 75 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,642,469 to Hannaford et al. ("the *Hannaford* patent") and U.S. Patent No. 3,919,691 to Noll ("the *Noll* patent). Claims 51, 53, 55, 61-70, 74, and 76 stand rejected under 35 U.S.C. 103(a) as being unpatentable over the Hannaford patent in view of the *Noll* patent and U.S. Patent No. 6,111,577 to Zilles ("the *Zilles* patent"). These rejections are respectfully traversed. Additionally, the Examiner objected to a substitute specification under 37 C.F.R. § 1.125(a). These objections and rejections are respectfully traversed for the reasons set forth below.

Change of Correspondence Address

On February 7, 2003, Applicants submitted a Change of Correspondence Address and a Power of Attorney requesting that all future correspondence be directed to that same address. Applicants respectfully request that all future correspondence be properly addressed to the present correspondence address as previously requested.

The Claims are Allowable over the Hannaford Patent and the Noll Patent

Claims 47-50, 52, 54, 56-60, 71-73, and 75 stand rejected under 35 U.S.C. 103(a) as being unpatentable over the *Hannaford* patent in view of the *Noll* patent. These rejections are respectfully traversed.

Claim 47 recites "a linkage coupling the object and the touchpad sensor." Claim 60 recites "a linkage coupling the object and the touchpad sensor." Similarly, claim 71 recites "detecting a position and a motion of an object in an x-y plane using a touchpad sensor, the object being coupled to the touchpad sensor via a linkage."

The *Hannaford* patent discloses a "pen-based direct drive manipulator" that is capable of moving in three degrees of freedom. *See* Abstract. The *Hannaford* patent discloses that the "manipulator 10 includes a planar structure 20 enabling motion in an xy plane to define two degrees of freedom." Column 4, lines 2-4. Furthermore, the *Hannaford* patent discloses that the "planar structure 20 is moved along a z-axis by actuators 22, 24." Column 4, lines 4-5.

Furthermore, the *Hannaford* patent discloses that "[a]n operator ... applies forces to the control point 12 within the end effector workspace 16." Column 8, lines 54-60.

The *Noll* patent discloses a tactile man-machine interface system. The system can detect the position of an arm member and apply appropriate forces to the arm member. *See* column 2, lines 24-38.

The *Hannaford* patent fails to disclose or suggest "a linkage coupling the object and the touchpad sensor," as recited in claim 47. Additionally, the *Hannaford* patent fails to disclose or suggest "a linkage coupling the object and the touchpad sensor," as recited in claim 60. Finally, the *Hannaford* patent fails to disclose or suggest "detecting a position and a motion of an object in an x-y plane using a touchpad sensor, the object being coupled to the touchpad sensor via a linkage," as recited in claim 71. Like the *Hannaford* patent, the *Noll* patent fails to disclose or suggest these features as recited in independent claims 47, 60, and 71.

Therefore, claims 47, 60, and 71 are allowable over the *Hannaford* patent in view of the *Noll* patent. Claims 48-50, 52, 54, 56-59, 72-73, and 75 depend from claims 47, 60, and 71, respectively, and are allowable for at least this reason. Applicants respectfully request that the Examiner withdraw his rejection of these claims.

The Claims are Allowable over the *Hannaford* Patent in View of the *Noll* Patent and the *Zilles* Patent

Claims 51, 53, 55, 61-70, 74, and 76 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the *Hannaford* patent in view of the *Noll* patent and the *Zilles* patent. These rejections are respectfully traversed.

Claims 51, 53, 55, 61-70, 74, and 76 depend from independent claims 47, 60, and 71. As discussed above, claims 47, 60, and 71 are allowable, and therefore claims 51, 53, 55, 61-70, 74, and 76 are allowable for at least the reasons discussed above. Applicants respectfully request that the Examiner withdraw his rejection of these claims.

No Substitute Specification Was Submitted

In the Office Action, the Examiner objected to a substitute specification under 37 C.F.R. § 1.125(a). Applicants respectfully submit that no substitute specification was filed on August

Page 9

12, 2003, and therefore the objection is improper. Applicants believe that the Examiner may have mistakenly confused Applicant's submission of copending patent Application Serial No. 09/748,051 in connection with the information disclosure statement filed on August 12, 2003, as a substitute specification. Therefore, Applicants believe this objection to be in error, as such Applicants respectfully request that the Examiner withdraw the rejection.

CONCLUSION

Applicants believe that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Dated: February 18, 2004

Cooley Godward LLP ATTN: Patent Group One Freedom Square Reston Town Center 11951 Freedom Drive Reston, VA 20190-5656 Tel: (703) 456-8000

Tel: (703) 456-8000 Fax: (703) 456-8100

192533 v1/RE 44K501!.DOC Respectfully submitted, COOLEY GODWARD LLP

By: Erik B. Milch

Reg. No. 42,887